

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**IN RE: AME CHURCH EMPLOYEE
RETIREMENT FUND LITIGATION,**

MDL Docket No. 1:22-md-03035-STA-jay

All Cases

**MOTION TO WITHDRAW AS COUNSEL, SUPPORTING MEMORANDUM OF LAW
AND CERTIFICATE OF CONSULTATION**

Dawn M. Campbell, Esq., counsel for Defendant / Cross-Defendant Reverend Dr. Jerome V. Harris, respectfully moves this Honorable Court to permit her to withdraw as counsel of record. In support of this motion, undersigned counsel states as follows:

1. Ms. Campbell has accepted a new position as General Counsel of a corporation and July 14, 2023 is her last day with Butler Snow LLP.
2. Dr. Harris will continue to be represented by Gadson W. Perry, Esq., and S. Keenan Carter, Esq., of Butler Snow LLP, who have played an active role in this matter.
3. Ms. Campbell has conferred with counsel of record in this case, who do not oppose the relief requested in this motion.

WHEREFORE, PREMISES CONSIDERED, undersigned counsel hereby moves to withdraw as counsel of record for Dr. Harris.

A proposed order granting this Motion to Withdraw as counsel is being emailed to Judge Anderson's chambers.

Respectfully submitted,

/s/ Dawn M. Campbell

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CERTIFICATE OF CONSULTATION

Pursuant to Rule 7.2(a)(1)(B) of the Local Rules for the United States District Court, Western District of Tennessee, Dawn M. Campbell, Esq., counsel of record for Defendant / Cross-Defendant Reverend Dr. Jerome V. Harris, certifies that on July 14, 2023, she conferred with counsel of record for Plaintiffs, Symetra, Newport, AMEC Defendants, and Robert Eaton via email regarding the relief requested in this motion. Gerard Stranch, Esq., Greg Francis, Esq., and Matthew Lee, Esq., on behalf of Plaintiffs, Bruce McMullen, Esq., for AMEC Defendants, Benjamin Stoll, esq., for Symetra, Sean Abouchedid, Esq., for Newport, and Clarence Wilbon, Esq., for Robert Eaton, advised they do not oppose the relief requested in this motion. The undersigned counsel attempted to confer with counsel for all other parties via email. Counsel for the other parties did not advise whether they oppose the relief requested by this motion.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon all counsel of record, by electronic means via the Court's electronic filing system, on this the 14th day of July 2023.

/s/ Dawn M. Campbell